

4:24cv979  
UNITED STATES DISTRICT COURTS  
EASTERN DISTRICT OF TEXAS  
Sherman DIVISION



Dana F. Young Residence: 5005 Whitestone Ln. Case Number: 450-2024-05025  
c/o PO Box 560512 #133  
The Colony Plano Tx 75024  
 Name of Plaintiff(s) 972-679-8744

vs

Collin College  
3452 Spur 399 STE 401-A  
McKinney Tx 75069  
 Name of Defendant(s)

COMPLAINT UNDER TITLE VII OF THE CIVIL RIGHTS ACT OF 1964

Note: If plaintiff is alleging employment discrimination based on race or color, please also see 42 U.S.C. 1981

1. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on the court by 42 U.S.C. 2000e-5. Equitable and other relief are also sought under 42 U.S.C. 2000e-5(g).

- 2.. Plaintiff, Dana F. Young, is a citizen of the United States  
 (name of plaintiff)  
 and resides at 5005 Whitestone Ln. #133, Plano,  
 (street address) (city)  
Collin, Tx, 75024, 972-679-8744  
 (county) (state) (zip) (telephone)

3.. Defendant, Collin College, resides at, or its business is  
 (name of defendant)  
 located at 3452 Spur 399 STE 401-A, McKinney,  
 (street address) (city)  
Collin, Tx, 75069, 972-548-6790  
 (county) (state) (zip) (telephone)

4. Plaintiff sought employment from the defendant or was employed by the defendant  
 at Preston Ridge Campus 9700, Frisco,  
 (street address) Wade (city)  
Blvd.  
Collin, Tx, 75035.  
 (county) (state) (zip)

5. Defendant discriminated against plaintiff in the manner indicated in paragraphs 9 and 10  
 of the complaint on or about September 27, 2023.  
 (month, day, year)

6. Plaintiff filed charges against the defendant with the Equal Employment Opportunity  
 Commission charging defendant with the acts of discrimination indicated in paragraphs  
 9 and 10 of this complaint on or about March 4, 2024.  
 (month, day, year)

7. The Equal Employment Commission issued a Notice of Right to Sue which was  
 received by plaintiff on August 5, 2024.  
 (month day, year)

8. Because of plaintiff's (1) ☒ race, (2) ☒ color, (3) \_\_\_\_\_ sex,  
(4) ☒ national origin, defendant:

- a. \_\_\_\_\_ failed to employ plaintiff.
- b. ☒ terminated plaintiff's employment.
- c. \_\_\_\_\_ failed to promote plaintiff.
- d. \_\_\_\_\_ Other \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

9. The circumstances under which the defendant discriminated against plaintiff were as follows:

"I was treated differently than  
another person who was not white,  
and terminated wrongfully."

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

10. The acts set forth in paragraph 9 of this complaint:

- a. ☐ are still being committed by defendant.
- b. ☐ are no longer being committed by defendant.
- c. ☒ defendant may still be committing the acts.

11. Plaintiff attaches to this complaint a copy of the charges filed with the Equal Employment Opportunity Commission which charges are submitted as a brief statement of the facts supporting this complaint. WHEREFORE, Plaintiff prays that the Court grant the following relief to the plaintiff:

- a. ☐ Defendant be directed to employ plaintiff.
- b. ☐ Defendant be directed to re-employ plaintiff.
- c. ☐ Defendant be directed to promote plaintiff.
- d. ☒ Defendant be directed to SUMMARY JUDGMENT and that the

Court grant such relief as may be appropriate, including injunctive orders, damages, costs and attorney's fees.

Donna Young 11-1-24  
(Signature of Plaintiff)